

To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: JAMES D WALKER
Sent: Fri 7/7/2017 5:55:43 PM
Subject: Question on the Format for Cadmus comments on the revised Gunnison permit application

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Hi Nancy,

What is your preference for the format of our comments on the revised permit application and the response to EPA comments on the previous Excelsior responses?

I am planning to use the enclosure to the May 10 EPA letter to Excelsior as the format for insertion of our comments, similar to the format used to document our comments on the changes to Attachment R. Where changes to the application were not discussed in the May 10 technical comment enclosure but require comments, we will add those comments to the comment document.

I have annotated the revised permit application attachments with comments in the margins, but the comments are basically just placeholders. I am not able to insert comments directly into the text of the application without Adobe Acrobat software or a WORD version of the application. The same is true of the PDF Version of the May 10 technical comments enclosure, unless I use the Cadmus WORD version of the technical comment document. Can you provide the WORD version of the enclosure? If not, I can use the Cadmus WORD version, but the format and text would not be completely identical to the EPA version.

Overall, the revised permit application seems to be mostly responsive to previous EPA comments and concerns. There are some minor inconsistencies and clarifications needed, but that may not require changes to the application if Excelsior provides an acceptable response to the EPA comments on the revised application. The major issues of electrical conductivity monitoring and the observation well monitoring during the post-rinsing period remain to be resolved with Excelsior, but may be addressed as permit conditions after further discussion and/or proposals by Excelsior.

Thanks,

Jim